Case 1:24-cv-06563-LJL Document 182-4 Filed 01/02/25 Page 1 of 12

EXHIBIT 4

| | | Page 1 |
|----|---|--------|
| 1 | | |
| 2 | UNITED STATES DISTRICT COURT | |
| | SOUTHERN DISTRICT OF NEW YORK | |
| 3 | x | |
| | RUBY FREEMAN and WANDREA' MOSS, | |
| 4 | | |
| | PLAINTIFFS, | |
| 5 | | |
| | -against- Case No.: | |
| 6 | 24-cv-6563 (LJL) | |
| 7 | RUDOLPH W. GIULIANI, | |
| 8 | DEFENDANT. | |
| | x | |
| 9 | | |
| 10 | | |
| 11 | DATE: December 31, 2024 | |
| 12 | TIME: 9:10 A.M. | |
| 13 | | |
| 14 | | |
| 15 | CONFIDENTIAL REALTIME VIDEOTAPED | |
| 16 | DEPOSITION of the Non-Party Witness, | |
| 17 | DR. MARIA RYAN, taken by the Plaintiffs, | |
| 18 | pursuant to a Subpoena and to the Federal | |
| 19 | Rules of Civil Procedure, held remotely, at | |
| 20 | all parties' locations, before Karyn | |
| 21 | Chiusano, a Notary Public of the State of | |
| 22 | New York. | |
| 23 | | |
| 24 | | |
| 25 | | |

| 1 | Page 2 | 1 | Page 4 |
|-----------------|--|----|--------------------------------------|
| 2 APPI | E A R A N C E S: | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 3 4 WILLE | KIE FARR & GALLAGHER, LLP | 2 | THE VIDEOGRAPHER: Good |
| | neys for the Plaintiffs | 3 | morning. |
| | Y FREEMAN and WANDREA' MOSS eventh Avenue | 4 | We are going on the record at |
| | York, New York 10019 | 5 | 9:10 A.M. Eastern Standard Time on |
| | M. ANNIE HOUGHTON-LARSEN, ESQ. | 6 | Tuesday, December 31st, 2024. |
| | TYLER KNOBLETT, ESQ. ghton-larsen@willkie.com | 7 | Please note that this |
| | lett@willkie.com | 8 | deposition is being conducted |
| 9 GOLD | BERG SEGALLA LLP | 9 | virtually. |
| 10 Attorn | neys for the Deponent | 10 | Quality of the recording |
| | IA RYAN rd Avenue ~ 19th Floor | 11 | depends on the quality of the camera |
| | York, New York 10017 | 12 | and internet connection of |
| | ADAM KATZ, ESQ. | 13 | participants. |
| 13 | @goldbergsegalla.com | 14 | What is heard from the witness |
| | MARATA & De MEYER P.C. | 15 | and seen on the screen is what will |
| | neys for the Defendant OLPH W. GIULIANI | 16 | be recorded. |
| 456 A | arlene Street | 17 | Audio and video recording will |
| | n Island, NY 10314 OSEPH CAMMARATA, ESQ. | 18 | continue to take place unless all |
| 17 joe@d | cdlawpc.com | 19 | parties agree to go off the record. |
| 18 19 | | 20 | This is Media Unit Number 1 of |
| | PRESENT: | 21 | the video-recorded deposition of |
| | MY KOVACS, Videographer | 22 | Dr. Maria Ryan taken by counsel for |
| 21 JOAN 22 * | NA LAMBERTA, Law Clerk * * * | 23 | Plaintiff in the matter of |
| 23 | | 24 | Ruby Freeman and Wandrea' Moss verse |
| 24 25 | | 25 | Rudy W. Giuliani and Andrew |
| | Page 3 | | Page 5 |
| 1 | _ | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 F E | EDERAL STIPULATIONS | 2 | Giuliani Andrew Rudolph W. |
| 3 | | 3 | Giuliani [sic]. |
| 4 | | 4 | This case is filed in the |
| 5 IT | IS HEREBY STIPULATED AND AGREED by and | 5 | United States United States |
| | veen the counsel for the respective | 6 | District Court for the District of |
| | les herein that the sealing, filing and | 7 | Columbia, Case Number 21-3354 [sic]. |
| - | fication of the within deposition be | 8 | My name is Jeremy Kovacs and I |
| | yed; that the original of the deposition | 9 | am your certified legal video |
| | be signed and sworn to by the witness | 10 | specialist. Your court reporter |
| | re anyone authorized to administer an | 11 | today is Karyn Chiusano, and we are |
| | with the same effect as if signed | 12 | both from the firm Veritext Legal |
| | re a judge of the Court; that an | 13 | Solutions. |
| | gned copy of the deposition may be used | 14 | I am not related to any party |
| | the same force and effect as if signed | 15 | in this action nor am I financially |
| | ne witness 30 days after service of the | 16 | interested in the outcome. |
| - | inal and one copy of same upon counsel | 17 | If there are any objections to |
| _ | | 18 | these proceedings, please state them |
| | he witness. | 19 | at the time of your appearance. |
| 19 | IC ELIDTHED CTIDIH ATED AND ACREED 4 | | |
| | IS FURTHER STIPULATED AND AGREED that | 20 | Not hearing anything, all |
| | bjections, except as to form, are | 21 | counsel will be noticed on the |
| | rved to the time of trial. | 22 | stenographic record and the court |
| 23 | | 23 | reporter may swear in the witness? |
| 24 | * * * * | 24 | THE COURT REPORTER: Can you |
| 25 | | 25 | raise your right hand, please? |

2 (Pages 2 - 5)

| , | Page 162 | , | Page 164 |
|--|--|--|---|
| 1 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | Joseph Ricci, was marked for | 2 | But I don't think any of the |
| 3 | identification as of this date by the | 3 | Giuliani Partners' are in existence |
| 4 | Reporter.) | 4 | anymore; Ryan Medrano's either. I don't |
| 5 | Q. Okay. Dr. Ryan I | 5 | I think those are all gone. |
| 6 | MS. HOUGHTON-LARSEN: I think | 6 | Q. Do you recall the last time you |
| 7 | this should be Exhibit 5. I think we | 7 | tried to access that e-mail account? |
| 8 | already have an Exhibit 4. | 8 | A. No, I don't. |
| 9 | MS. LAMBERTA: Apologies. I | 9 | Q. Do you think it would've been |
| 10 | will remark it. | 10 | in the last year? |
| 11 | Q. Sorry, Dr. Ryan. There are | 11 | MR. CAMMARATA: Objection. |
| 12 | some things that are easier about a Zoom | 12 | A. I don't think so. |
| 13 | deposition and some things that are harder, | 13 | Q. Thank you. |
| 14 | but I appreciate you sticking with me. | 14 | Do you have an understanding as |
| 15 | All right. Do you see this | 15 | to why Joseph Ricci was sending this e-mail |
| 16 | document, Dr. Ryan | 16 | to you about it why he was sending this |
| 17 | A. I can't | 17 | e-mail to you? |
| 18 | Q which is Exhibit 5? | 18 | A. Yes. |
| 19 | A. It needs to be blown up just a | 19 | Because he was hoping that I |
| 20 | little bit. | 20 | would flag it for the mayor. Absolutely. |
| 21 | Q. Okay. Great. | 21 | Q. Okay. |
| 22 | Now can you see it? | 22 | A. And this this used to happen |
| 23 | A. Yep. | 23 | quite frequently when people tried to |
| 24 | Q. Okay. Do you recognize this? | 24 | the mayor does not do e-mail, does not do |
| 25 | I mean, take a minute to review it, first | 25 | text. |
| | | | |
| | Page 163 | | Page 165 |
| 1 | Page 163 CONFIDENTIAL ~ DR. MARIA RYAN | 1 | Page 165 CONFIDENTIAL ~ DR. MARIA RYAN |
| 1 2 | = | 1 2 | • |
| | CONFIDENTIAL ~ DR. MARIA RYAN | | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or |
| 2 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) | 2 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a |
| 2 3 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? | 2 3 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. |
| 2 3 4 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) | 2 3 4 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that |
| 2 3 4 5 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean | 2 3 4 5 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. |
| 2 3 4 5 6 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but | 2 3 4 5 6 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that |
| 2 3 4 5 6 7 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this | 2 3 4 5 6 7 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails |
| 2 3 4 5 6 7 8 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on | 2 3 4 5 6 7 8 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to |
| 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. |
| 2 3 4 5 6 7 8 9 10 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make |
| 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc | 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either |
| 2 3 4 5 6 7 8 9 10 11 12 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and | 2 3 4 5 6 7 8 9 10 11 12 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. |
| 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. | 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? | 2 3 4 5 6 7 8 9 10 11 12 13 14 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax returns"? | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the old-timers know, like Joe Ricci knows to do |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax returns"? A. I do. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the old-timers know, like Joe Ricci knows to do that, but I can't think and then, his |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax returns"? A. I do. Q. Okay. And TruthandJustice4U, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the old-timers know, like Joe Ricci knows to do that, but I can't think and then, his predecessor, Lisa Osofsky, would call me to |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | confidential ~ Dr. Maria Ryan of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax returns"? A. I do. Q. Okay. And TruthandJustice4U, is that Mr. Giuliani's e-mail address? | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the old-timers know, like Joe Ricci knows to do that, but I can't think and then, his predecessor, Lisa Osofsky, would call me to alert the mayor that he has something in |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax returns"? A. I do. Q. Okay. And TruthandJustice4U, is that Mr. Giuliani's e-mail address? A. It is. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the old-timers know, like Joe Ricci knows to do that, but I can't think and then, his predecessor, Lisa Osofsky, would call me to alert the mayor that he has something in his e-mail. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax returns"? A. I do. Q. Okay. And TruthandJustice4U, is that Mr. Giuliani's e-mail address? A. It is. Q. And Ryan maria.ryan@giulianipartners.com, is that an e-mail address associated with you? | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the old-timers know, like Joe Ricci knows to do that, but I can't think and then, his predecessor, Lisa Osofsky, would call me to alert the mayor that he has something in his e-mail. But I wouldn't say that's an ongoing practice with other people. Q. Okay. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | CONFIDENTIAL ~ DR. MARIA RYAN of all, and then can you tell me if you recognize this exhibit? (Witness reviews document.) A. I don't. But I'm not I mean I don't really but Q. And can you see that this appears to be an e-mail sent on November 30, 2023, by Joseph Ricci A. Yep. Q to TruthandJustice4U@protonmail.com and maria.ryan@giulianipartners.com; cc ryan.medrano@giulianipartners.com? A. I do. Q. Subject line: "Filing of tax returns"? A. I do. Q. Okay. And TruthandJustice4U, is that Mr. Giuliani's e-mail address? A. It is. Q. And Ryan maria.ryan@giulianipartners.com, is that an | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | CONFIDENTIAL ~ DR. MARIA RYAN And it's became habit that people would either cc me or Ted or somebody to flag him that he's got a meeting or someone needs to talk to him. Q. Do you think that most e-mail e-mails MS. HOUGHTON-LARSEN: Pardon me. Q most e-mails to Mr. Giuliani, nowadays, likely cc either you or Mr. Goodman or Mr. Medrano to make sure the mayor sees them? MR. CAMMARATA: Objection. A. I could not say that to be true, no. I I think some of the old-timers know, like Joe Ricci knows to do that, but I can't think and then, his predecessor, Lisa Osofsky, would call me to alert the mayor that he has something in his e-mail. But I wouldn't say that's an ongoing practice with other people. |

42 (Pages 162 - 165)

| Page 166 CONFIDENTIAL ~ DR. MARIA RYAN mark Tab FFF, Joanna, as Plaintiffs' Exhibit 6, please? MS. LAMBERTA: "FFF," you said? MS. HOUGHTON-LARSEN: Yep. MS. LAMBERTA: Okay. Sure. Q. And just while Joanna's pulling tup, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked for identification as of this date by | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | Page 168 CONFIDENTIAL ~ DR. MARIA RYAN this document to Plaintiffs? MR. CAMMARATA: Objection. A. Why why would I? Q. I'm not really su supposed to you're you're testifying, so I'm not really supposed to answer your questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. A me. It's having the mayor |
|--|--|--|
| mark Tab FFF, Joanna, as Plaintiffs' Exhibit 6, please? MS. LAMBERTA: "FFF," you said? MS. HOUGHTON-LARSEN: Yep. MS. LAMBERTA: Okay. Sure. Q. And just while Joanna's pulling tup, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | this document to Plaintiffs? MR. CAMMARATA: Objection. A. Why why would I? Q. I'm not really su supposed to you're you're testifying, so I'm not really supposed to answer your questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| Exhibit 6, please? MS. LAMBERTA: "FFF," you said? MS. HOUGHTON-LARSEN: Yep. MS. LAMBERTA: Okay. Sure. Q. And just while Joanna's pulling tup, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that mail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | MR. CAMMARATA: Objection. A. Why why would I? Q. I'm not really su supposed to you're you're testifying, so I'm not really supposed to answer your questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| MS. LAMBERTA: "FFF," you said? MS. HOUGHTON-LARSEN: Yep. MS. LAMBERTA: Okay. Sure. Q. And just while Joanna's pulling t up, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | A. Why why would I? Q. I'm not really su supposed to you're you're testifying, so I'm not really supposed to answer your questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| MS. HOUGHTON-LARSEN: Yep. MS. LAMBERTA: Okay. Sure. Q. And just while Joanna's pulling t up, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 5 6 7 8 9 10 11 12 13 14 15 16 17 | Q. I'm not really su supposed to you're you're testifying, so I'm not really supposed to answer your questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| MS. LAMBERTA: Okay. Sure. Q. And just while Joanna's pulling tup, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 6 7 8 9 10 11 12 13 14 15 16 17 | to you're you're testifying, so I'm not really supposed to answer your questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| Q. And just while Joanna's pulling tup, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 7 8 9 10 11 12 13 14 15 16 17 | not really supposed to answer your questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| t up, the November 30th, 2023 e-mail m Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 8 9 10 11 12 13 14 15 16 17 | questions. Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| n Mr. Ricci that we just looked at, did a produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 9 10 11 12 13 14 15 16 17 | Could you please answer my question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| produce that document to Plaintiffs? A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 10 11 12 13 14 15 16 17 | question of whether you produced this document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| A. I don't have access to that nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 11 12 13 14 15 16 17 | document to Plaintiffs? A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| nail. Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 12 13 14 15 16 17 | A. I didn't MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| Q. Okay. MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 13 14 15 16 17 | MR. CAMMARATA: Objection. A have it anymore. It's not about Q. Okay. |
| MS. HOUGHTON-LARSEN: We're ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 14 15 16 17 | A have it anymore. It's not about Q. Okay. |
| ready for oh, perfect. (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 15 16 17 | about Q. Okay. |
| (Whereupon, Plaintiffs' Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 16 17 | Q. Okay. |
| Exhibit 6, 10/15/2024 E-mail, Subject: Gift Tax Return, was marked | 17 | The state of the s |
| Subject: Gift Tax Return, was marked | | Δ me It's having the mayor |
| | 18 | |
| for identification as of this date by | | sign something, so I'm sure I got rid of it |
| | 19 | almost immediately. |
| the Reporter.) | 20 | Q. When you mean when you say |
| MS. HOUGHTON-LARSEN: Let's | 21 | "get rid of it," do you mean deleted it? |
| zoom in before I start asking any | 22 | A. Yeah. I'm sure I got rid of |
| questions. | 23 | anything that doesn't have to pertain to |
| Go up. Okay. | 24 | to me. That's his business about his |
| Q. Dr. Ryan, can you see the | 25 | taxes. |
| Page 167 | | Page 169 |
| | | CONFIDENTIAL ~ DR. MARIA RYAN |
| | l | Q. Is it your regular practice to |
| | 3 | delete e-mails and documents as soon as you |
| | 4 | don't need them anymore? |
| | l | A. Yes. |
| | l | MR. CAMMARATA: Objection. |
| Q. Do you rec do you recognize | 7 | A. Been like that my whole life. |
| document? | 8 | Q. Okay. Are you the same way |
| A. That sounds familiar. | 9 | with text messages? |
| Q. Okay. So do you see that this | 10 | A. Yes, definitely. I I don't |
| October 15th, 2024 e-mail from | 11 | like all the mess of too many messages, so |
| eph Ricci to you at | 12 | I like to if I was to talk to you, it |
| riaryannh@gmail.com; "Subject: Gift tax | 13 | would be deleted almost when I'm done |
| ırn." | 14 | talking to you. |
| A. Yep. | 15 | Q. For all communications or only |
| Q. Do you see that? | 16 | business communications? |
| A. Yep. | 17 | MR. CAMMARATA: Objection. |
| Q. And do you see this says: | 18 | A. Pretty much all communications. |
| "Hi Maria. Please see attached | 19 | Q. You testified earlier about |
| tax return. Please have RWG sign and | 20 | Mr. Giuliani declaring bankruptcy. |
| e and mail to the address indicated | 21 | Do you recall that? |
| ay." | 22 | A. I do. |
| | 23 | Q. Do you have an understanding of |
| | 24 | why Mr. Giuliani declared bankruptcy? |
| Q. Do you know if you produced | 25 | A. Yes. |
| | questions. Go up. Okay. Q. Dr. Ryan, can you see the Page 167 CONFIDENTIAL ~ DR. MARIA RYAN document on your screen? A. Yes. Q. And this has been marked as intiffs' Exhibit 6? A. Yeah. Q. Do you rec do you recognize document? A. That sounds familiar. Q. Okay. So do you see that this October 15th, 2024 e-mail from eph Ricci to you at riaryannh@gmail.com; "Subject: Gift tax urn." A. Yep. Q. Do you see that? A. Yep. Q. And do you see this says: "Hi Maria. Please see attached tax return. Please have RWG sign and e and mail to the address indicated ay." Do you see that? A. Yep. | questions. Go up. Okay. Q. Dr. Ryan, can you see the Page 167 CONFIDENTIAL ~ DR. MARIA RYAN document on your screen? A. Yes. Q. And this has been marked as intiffs' Exhibit 6? A. Yeah. Q. Do you rec do you recognize document? A. That sounds familiar. Q. Okay. So do you see that this October 15th, 2024 e-mail from eph Ricci to you at riaryannh@gmail.com; "Subject: Gift tax urn." A. Yep. Q. Do you see that? A. Yep. Q. And do you see this says: "Hi Maria. Please see attached tax return. Please have RWG sign and e and mail to the address indicated ay." Do you see that? A. Yep. Do you see that? A. Yep. Do you see that? A. Yep. |

43 (Pages 166 - 169)

| 1 | Page 170 CONFIDENTIAL ~ DR. MARIA RYAN | 1 | Page 172 |
|----|---|----|---|
| 1 | | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | MR. CAMMARATA: Objection. | 2 | to Mr. Giuliani's defense fund in exchange |
| 3 | A. In in my opinion, I do, yes. | 3 | for him speaking there? |
| 4 | Q. All right. Could you explain | 4 | MR. CAMMARATA: Objection. |
| 5 | your opinion of why Mr. Giuliani declared | 5 | A. I don't know if I understand |
| 6 | bankruptcy, please? | 6 | that. |
| 7 | A. Well, he was in front of a | 7 | Q. Sure. |
| 8 | crooked judge in Washington, D.C., and he | 8 | So, my my question is: Is |
| 9 | was never allowed a trial. And because he | 9 | it your understanding that there was some |
| 10 | got onslaughted [sic] with document | 10 | sort of trade or exchange? Mr. Giuliani |
| 11 | requests, thousands of pages, that the | 11 | appeared at an event or did some type of |
| 12 | judge did a default hearing, and then there | 12 | speaking for Sheridan. Church, and then, in |
| 13 | was a ridiculous \$148 million judgment. | 13 | exchange, Sheridan.Church contributed to |
| 14 | Well, the guy was is only | 14 | his legal defense? Is that your |
| 15 | worth his properties, so, yeah, he had to | 15 | understanding? |
| 16 | be forced into bankruptcy. That's my | 16 | MR. CAMMARATA: Objection. |
| 17 | understanding. | 17 | A. It didn't seem like it was, you |
| 18 | Q. Okay. Do you when did you | 18 | do this and we'll do that. It it was |
| 19 | become aware that Mr. Giuliani was going | 19 | more like people are praying for you here, |
| 20 | to or wanted to file bankruptcy? | 20 | they see the miscarriage of justice, we'd |
| 21 | A. I don't recall. | 21 | like to invite you in a loving environment. |
| 22 | Q. Do you recall whether you were | 22 | And while they were doing the sermon, the |
| 23 | aware before Mr. Giuliani filed, or did you | 23 | pastor brought up his struggles and they |
| 24 | become aware afterwards? | 24 | put up the defense fund so people can |
| 25 | MR. CAMMARATA: Objection. | 25 | contribute. |
| | Page 171 | | Page 173 |
| 1 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | A. I don't recall. | 2 | Q. Did you travel to were you |
| 3 | Q. Okay. | 3 | also present at Sheridan.Church at that |
| 4 | MS. HOUGHTON-LARSEN: Can we | 4 | time you were just describing? |
| 5 | mark Tab C, please, Joanna? And I | 5 | A. I was. |
| 6 | think it's Plaintiffs' Exhibit 7. | 6 | Q. Did Sheridan.Church pay for |
| 7 | Yes. | 7 | your and Mr. Giuliani's travel to and from |
| 8 | (Whereupon, Plaintiffs' | 8 | Tulsa? |
| 9 | Exhibit 7, 12/18/2023 E-mail from | 9 | A. They did. |
| 10 | Maria Ryan, Re: Bankruptcy, was | 10 | Q. Do you recall arranging that |
| 11 | marked for identification as of this | 11 | travel with Sheridan.Church? |
| 12 | date by the Reporter.) | 12 | MR. CAMMARATA: Objection. |
| 13 | Q. While we're waiting for that to | 13 | A. I they they arranged it, |
| 14 | come up. | 14 | but I'm aware of it, yes. |
| 15 | Dr. Ryan, does Sheridan.Church | 15 | Q. And do you recall, like, |
| 16 | in Tulsa ring a bell for you? | 16 | Sheridan.Church sending you flight |
| 17 | A. It does. | 17 | information or hotel information for your |
| 18 | MR. CAMMARATA: Objection. | 18 | trip? |
| 19 | Q. Do you recall whether | 19 | A. I'm sure they did. |
| 20 | Sheridan.Church is a place where | 20 | Q. Okay. |
| 21 | Mr. Giuliani has done paid speaking? | 21 | MS. HOUGHTON-LARSEN: So if we |
| 22 | A. He has not done paid speaking, | 22 | could pull up this document, Joanna, |
| 23 | but he has been invited there, and they | 23 | it should be Exhibit 7. |
| 24 | contributed to his defense fund. | 24 | You can see it's marked |
| 25 | Q. Did Sheridan.Church contribute | 25 | Exhibit 7, and then I'll zoom in. |

44 (Pages 170 - 173)

| CONFIDENTIAL ~ DR. MARIA RYAN 2 | I'm |
|---|----------|
| 2 And then there are 15 requests. 3 Do you see that? 4 A. I do. 5 Q. Okay. And does this refresh 6 your recollection regarding this document? 7 A. It doesn't. When I was 8 notified that there was questions, I think 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. 18 let's go - let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 20 Large and then there is 2:46 P.M. 3 MS. HOUGHTON-LARSEN: I okay. 5 So we were about to pull up, 6 Joanna, as an exhibit Tab 33, which is Plaintiffs' Exhibit I don't know. You'll tell me. 9 MS. LAMBERTA: It's going to 27. One of them is just out of 28. One of them is just out of 29. One of them is just out of | I'm |
| Do you see that? 4 A. I do. 5 Q. Okay. And does this refresh 6 your recollection regarding this document? 7 A. It doesn't. When I was 8 notified that there was questions, I think 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 3 MS. HOUGHTON-LARSEN: Okay. 4 Okay. 5 So we were about to pull up, 6 Joanna, as an exhibit Tab 33, which is Plaintiffs' is Plaintiffs' Exhibit Tab 33, which is Plaintiffs' Exhibit Tab 33, which is Plaintiffs' Exhibit Tab 33, is Plaintiffs' Exhibit 27, Document Request Response, was marked for identification as of this date by the Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Oxay. 22 Zoom in? 23 This actually, probably, will 24 take a few minutes, so if you want to take a break to use the ladies' room 25 A. Yes, I can. But I'm very happy | |
| 4 A. I do. 5 Q. Okay. And does this refresh 6 your recollection regarding this document? 7 A. It doesn't. When I was 8 notified that there was questions, I think 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 4 okay. 5 So we were about to pull up, 6 Joanna, as an exhibit Tab 33, So we were about to pull up, 6 Joanna, as an exhibit Tab 33, which is Plaintiffs' Exhibit I don't tell me. 9 MS. LAMBERTA: It's going to 27. One of them is just out of order, so this is 27 and then, 10 27. One of them is just out of order, so this is 27 and then, 11 order, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: 0 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Request 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: 0 22 Definition of all, Dr. Ryan, can you 24 take a few minutes, so if you want to 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| 5 Q. Okay. And does this refresh 6 your recollection regarding this document? 7 A. It doesn't. When I was 8 notified that there was questions, I think 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 25 So we were about to pull up, 26 Joanna, as an exhibit Tab 33, which is Plaintiffs' Exhibit I don't which is Plaintiffs' Exhibit I don't him key 10 Joanna, as an exhibit Tab 33, which is Plaintiffs' Exhibit I don't to is Plaintiffs' Exhibit I don't to is Plaintiffs' Exhibit 27, Document Request Response, was marked for identification as of this date by the Reporter.) 21 MS. HOUGHTON-LARSEN: Okay. So 22 Joom in? 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 25 A. Yes, I can. But I'm very happy | 1 |
| 6 your recollection regarding this document? 7 A. It doesn't. When I was 8 notified that there was questions, I think 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 20 Uriting a company take a few minutes, so if you want to 21 Danna, as an exhibit Tab 33, which is Plaintiffs' Exhibit I don't don't is Plaintiffs' Exhibit is 27. One of them is just out of order, so this is 27 and then, there'll be a 26. 13 MS. HOUGHTON-LARSEN: Objection. 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Request Response, was marked for identification as of this date by the Reporter.) 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 Reporter.) 19 Q. Okay. So this has been marked or identifies in a company in plaintiffs' Exhibit 27. 20 MS. HOUGHTON-LARSEN: Okay. 21 MS. HOUGHTON-LARSEN: Okay. 22 Zoom in? 23 This actually, probably, will 24 take a few minutes, so if you want to take a few minutes, so if you want to take a break to use the ladies' room Page 259 | 1 |
| 7 A. It doesn't. When I was 8 notified that there was questions, I think 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 25 take a break to use the ladies' room 27 Is Plaintiffs' Exhibit I don't 28 know. You'll tell me. 29 MS. LAMBERTA: It's going to condend the proposition of them is just out of order, so this is 27 and then, 10 Carlon order, so this is 27 and then, 11 order, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: Order in the in the proposition of them is just out of order, so this is 27 and then, 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Request 16 Response, was marked for identification as of this date by the Reporter.) 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Order in the proposition of the propositi | 1 |
| 8 notified that there was questions, I think 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 26 MS. LAMBERTA: It's going to a condition at them is just out of order, so this is 27 and then, 10 27. One of them is just out of order, so this is 27 and then, 11 order, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: 0 15 Exhibit 27, Document Request 16 Response, was marked for identification as of this date by the Reporter.) 18 Reporter.) 19 Q. Okay. So this has been marked and the | |
| 9 I only got the questions. 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 27 One of them is just out of 10 27. One of them is just out of 10 27. One of them is just out of 11 order, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: O 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Request 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: One of them is just out of 11 order, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: One of them is just out of 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Request 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: One of them is just out of 10 creer, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: One of them is just out of 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Plaintiffs' 26 Response, was marked for 27 identification as of this date by the 28 Reporter.) 29 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: One of them, 22 Description of the creer of the c | |
| 10 Q. Okay. And do you recall who 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 10 27. One of them is just out of order, so this is 27 and then, 11 order, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: Okay. So 14 (Whereupon, Plaintiffs' Exhibit 27, Document Request 16 Response, was marked for identification as of this date by the Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Okay. So 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| 11 you got the questions from? 12 MR. CAMMARATA: Objection. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 10 Order, so this is 27 and then, 12 there'll be a 26. 13 MS. HOUGHTON-LARSEN: Okay. So 14 (Whereupon, Plaintiffs' Exhibit 27, Document Request 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Okay. So 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | be be |
| 12 there'll be a 26. 13 Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 24 take a break to use the ladies' room 25 Page 259 26 We can have both document up at 27 there'll be a 26. 18 MS. HOUGHTON-LARSEN: Okay. So 19 Gry Rosen. 16 Q. Okay. 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Okay. 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| Q. Dr. Ryan? 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 13 MS. HOUGHTON-LARSEN: Okay. So 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Request 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Okay. So 22 zoom in? 23 Zoom in? 24 See this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| 14 A. I believe I was notified by 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 14 (Whereupon, Plaintiffs' 15 Exhibit 27, Document Request 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Okay. So 22 zoom in? 23 Zoom in? 24 See this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| 15 Gary Rosen. 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 26 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Okay. 22 zoom in? 23 Q. First of all, Dr. Ryan, can you see this document on your screen? 24 Yes, I can. But I'm very happy | Okay. |
| 16 Q. Okay. 17 MS. HOUGHTON-LARSEN: Okay. So 18 let's go let's mark Tab 33, 19 Joanna. And I I don't think that 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 16 Response, was marked for 17 identification as of this date by the 18 Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Okay. 22 zoom in? 23 Zoom in? 24 See this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| MS. HOUGHTON-LARSEN: Okay. So let's go let's mark Tab 33, Joanna. And I I don't think that we can have both documents up at the on the screen at both times, but we'll see how this goes. This actually, probably, will take a few minutes, so if you want to take a break to use the ladies' room MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. MS. HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27. AND HOUGHTON-LARSEN: Okay. So this has been marked Plaintiffs' Exhibit 27 | |
| let's go let's mark Tab 33, Joanna. And I I don't think that we can have both documents up at the on the screen at both times, but we'll see how this goes. This actually, probably, will take a few minutes, so if you want to take a break to use the ladies' room Reporter.) 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Question of the screen at both times, 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| Joanna. And I I don't think that we can have both documents up at the on the screen at both times, but we'll see how this goes. This actually, probably, will take a few minutes, so if you want to take a break to use the ladies' room This actually probably will And I I don't think that 19 Q. Okay. So this has been marked 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: Question of the companion o | |
| 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: 0 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| 20 we can have both documents up at 21 the on the screen at both times, 22 but we'll see how this goes. 23 This actually, probably, will 24 take a few minutes, so if you want to 25 take a break to use the ladies' room 20 Plaintiffs' Exhibit 27. 21 MS. HOUGHTON-LARSEN: 0 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | 1 |
| but we'll see how this goes. This actually, probably, will take a few minutes, so if you want to take a break to use the ladies' room 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | |
| but we'll see how this goes. This actually, probably, will take a few minutes, so if you want to take a break to use the ladies' room 22 zoom in? 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy | Can you |
| This actually, probably, will take a few minutes, so if you want to take a break to use the ladies' room 23 Q. First of all, Dr. Ryan, can you 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy Page 259 | • |
| take a few minutes, so if you want to take a break to use the ladies' room 24 see this document on your screen? 25 A. Yes, I can. But I'm very happy Page 259 | |
| 25 take a break to use the ladies' room 25 A. Yes, I can. But I'm very happy Page 259 | |
| Page 259 | 7 |
| THE CONFIDENTIAL ~ DR. MARIA RYAN THE CONFIDENTIAL ~ DR. MARIA | Page 261 |
| | |
| 2 or get a water or anything, now would 2 I responded to that request. I wasn't su | re |
| 3 be a good time. 3 if I did or didn't. | |
| 4 THE WITNESS: Okay. I think I 4 Q. Okay. So you can do you | |
| 5 will go to the ladies' room. 5 recognize this document? | |
| 6 MS. HOUGHTON-LARSEN: Okay. 6 A. I do. | |
| 7 It's 2:37 oh, let's just wait 7 Q. Okay. And what is it? | |
| 8 oh, sorry, Dr. Ryan. 8 A. It's the response to the | |
| 9 THE WITNESS: Oh. 9 document request. | |
| MS. HOUGHTON-LARSEN: Let's 10 Q. Okay. So what I'd like to do | |
| just wait for Jeremy to take us off 11 is I'd just like to go through the specific | |
| the record. 12 questions and then your answers. And | so, |
| THE WITNESS: Okay. 13 I'm going to read from Exhibit 25 the | |
| MS. HOUGHTON-LARSEN: And we'll 14 questions. If you want them pulled up | |
| 15 come back maybe at 2:45. 15 the screen, we'll just have to go back an | ıd |
| 16 THE WITNESS: Okay. 16 forth. | |
| THE VIDEOGRAPHER: This is the 17 So Document Request 1 is: | |
| 18 end end of Media Unit Number 4. 18 "All documents and | |
| We're going off record. 19 communications relating to the nature of | C |
| 20 The time is 2:38 P.M. 20 Mr. Giuliani's use and occupancy of the | |
| 21 (Whereupon, a short recess was 21 Palm Beach condo, including his purpo | e |
| 22 taken.) 22 intention to establish it as a permanent | e |
| 23 THE VIDEOGRAPHER: This is the 23 residence." | e |
| 24 start of Media Unit Number 5. 24 Okay? | e |
| 25 We are back on the record. 25 A. Okay. | e |

66 (Pages 258 - 261)

| Page 264 CONFIDENTIAL - DR. MARIA RYAN Q. And then, if we look at this downent, your answer is: "Attached is an email between Southeby's [sic] and myself." A. Uh-hum. Yes. Q. And do you understand that in response to Document Request 1, you only response to Document Request 1, you only produced one e-mail between Sotheby's and to which includes his staff. A. Yes. I was aware of that. A. When it comes to the A. When it comes to the Be the real estate agreement. A. When it comes to the Co. And so, just so I'm clear. Q. And do you understand that you don't have any texts or e-mails, phone records or anything, moving documents, invoices relating to Mr. Giuliani's use and cocupancy of the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go The page 265 Q. So reading from Plaintiffs' Betwin the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. So So reading from Plaintiffs' Betwin the Palm Beach condo. I don't let easier there you go, it's a little easier there you go, i | | | | |
|--|--|--|--|--|
| 2 Q. And then, if we look at this 3 document, your answer is: 4 ""Attached is an email between 5 Southeby's [sic] and myself." 6 Do you see that? 7 A. Uh-hum. Yes. 8 Q. And do you understand that in 9 response to Document Request 1, you only 10 produced one e-mail between Sotheby's and 11 yourself? 12 A. Yes. I was aware of that. 13 Q. And is if your testimony that 14 no -you do not have any other documents 15 that are responsive to that request? 16 A. When it comes to the 17 homesteading, I don't have -no. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 20 If's your testimony that you 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo. 25 than this Sotheby's e-mail? 26 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his -1 - I totally don't 2 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm - Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Lef's go 10 to -a nal let's - zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier to see. 14 little easier to see. 15 Q. So reading from Plaintiff's 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel for whereabouts 19 property", which I will tell you is 19 defined as: 20 understand that in 21 public that his organization paid for 22 the mayor and his staff to attend the RNC 23 in the RNC 24 and DNC as part of his role with 25 that request? 26 Do, and do you understand that you 27 dod you see that? 28 Lib-hmm. 29 A. Ves. I - I absolutely 20 cocupancy of the Palm Beach 21 to don't have a single document request and that you 22 document request just so it's a 23 in title easier of see. 24 CONFIDENTIAL ~ DR. MARIA RYAN 25 A. A. Jh-hma 26 A. Jh-hma 27 A. I don't believe I do. 28 A. Go, Way. 39 Ms. HOUGHTON-LARSEN: Lef's g | , | | | |
| document, your answer is: 4 | | | | |
| 4 "This is an overburdensome 5 Southeby's [sic] and myself." 6 Do you see that? 7 A. Uh-hum. Yes. 8 Q. And do you understand that in 9 response to Document Request I, you only 10 produced one e-mail between Sotheby's and 11 poursel? 12 A. Yes. I was aware of that. 13 Q. And is it your testimony that 14 no – you do not have any other documents 15 that are responsive to that request? 16 A. When it comes to the 17 homesteading, I don't have – no. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 20 If's your testimony that you 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? Page 263 7 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything on personal about his – 1- I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. 7 condo. 8 Q. Okay, 9 MS. HOUGHTON-LARSEN: Let's go 10 to – and lef's – zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier to see. 14 little easier to see. 15 Q. So reading from Plaintiff's 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travels between July 1st, 19 Q. Okay. 20 Jokay. Document Request 4 is 21 logistics", such as credit card 22 statements, receipts, reimbursements, 23 titineraries, airline or train tickets, car 24 rental resvervations, lodging bookings or 25 defined as: 26 "COPPIDENTIAL or DR. MARIA RYAN" 27 A. D. I wouldn't have amything on his Palm – Palm Beach 28 condo. 29 (Okay. Going to Document 30 And your response is: 31 A. Yes. 1 — I obtally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 5 have a spitch got a defined as: 5 over a defined as: 6 (COPPIDENTIAL or DR. MARIA RYAN) 2 A. No. I wouldn't have a mything on | | | | · · · · · · · · · · · · · · · · · · · |
| 5 Southeby's [sic] and myself." 6 Do you see that? 7 A. Uh-hum. Yes. 8 Q. And do you understand that in 9 response to Document Request I, you only 10 produced one e-mail between Sotheby's and 11 yourself? 12 A. Yes. I was aware of that. 12 A. Yes. I was aware of that 14 noyou do not have any other documents 15 that are responsive to that request? 16 A. When it comes to the 17 homesteading, I don't haveno. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 19 Universe redaing to Mr. Giuliani's use and 20 occupancy of the Palm Beach condo. Other than this Sotheby's e-mail? 19 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything on his Palm Palm Beach condo. I don't have anything on his Palm Palm Beach condo. I don't have anything on his Palm Palm Beach condo. I don't a even get why I would be asked about his stuff with the Palm Beach condo. I don't a have anything on his Palm Palm Beach condo. I don't a late casier there you go, it's a little easier - there you go, it's a little easier rose. 15 Q. So reading from Plaintiffs' 15 Mr. Giuliani's travel who with course in the mayor and his staff to attend the RNC and his staff to attend the RNC and his staff to attend the RNC and by our understand that you don't have no. It would be the real estate agreement. 16 Q. And do you understand that you don't have any thing moving documents, invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo. I don't have anything moving document request by document request just so it's a little easier - there you go, it's a little easier - there you go, it's a little easier rose. 19 Q. Okay. Okay. And just so I'm clear. 19 Q. Okay. Okay. And just so I'm clear. 19 Q. Okay. Okay. And just so I'm clear. 19 Q. Okay. Okay. And just so I'm clear. 19 Q. Okay. | | | l | |
| 6 Do you see that? 7 A. Uh-hum. Yes. 8 Q. And do you understand that in response to Document Request I, you only produced one e-mail between Sotheby's and little easier to see. 13 Q. And is it your testimony that noyou do not have any other documents to the bether real estate agreement. 14 noyou do not have any other documents to the bether real estate agreement. 15 that are responsive to that request? 16 A. When it comes to the lomesteading, I don't haveno. It would like be the real estate agreement. 17 homesteading, I don't haveno. It would like be the real estate agreement. 18 bethe real estate agreement. 19 Q. And so, just so I'm clear. 20 If's your testimony that you don't have any tests or e-mails, phone records or anything, moving documents, and occupancy of the Palm Beach condo other than this Sotheby's e-mail? 1 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything spersonal about his1 - I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm - Palm Beach condo. 10 to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier to see. 14 [ittle easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for documents and communications relating to tarvel plans and conversations relating to travel plans and conversations, relating to travel plans and conversations, relating to trav | | | l | |
| 7 A. Ub-hum. Yes. 8 Q. And do you understand that in 9 response to Document Request I, you only 10 produced one e-mail between Sotheby's and 11 yoursel? 12 A. Yes. I was aware of that. 13 Q. And is it your testimony that 14 no -you do not have any other documents 15 that are responsive to that request? 16 A. When it comes to the 17 homesteading, I don't have - no. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 19 Q. And so, just so I'm clear. 20 It's your testimony that you 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo. Idon't 25 than this Sotheby's e-mail? 26 CONFIDENTIAL ~ DR. MARIA RYAN 27 A. No. I wouldn't have anything 38 personal about his I - I totally don't 40 even get why I would be asked about his 51 stuff with the Palm Beach condo. 52 Q. Okay. 53 MS. HOUGHTON-LARSEN: Let's go 64 to and DNC as part of his role with 65 It was a produce any documents in response to didn't produce any documents in response to that request? 66 (Condo.) 67 CONFIDENTIAL ~ DR. MARIA RYAN 68 Q. Okay. 69 MS. HOUGHTON-LARSEN: Let's go 70 to and let's - zoom in, Joanna, 71 and so we can go document request by 71 document request just so it's a 72 little easier to see. 73 little easier to see. 74 little easier or see. 75 reading from Plaintiff's 76 Exhibit 25, Document Request 2 is for 77 documents and communications relating to Mr. Giuliani's ravel within file little lit | | | | = |
| Request Number 2? Q. And do you understand that in response to Document Request 1, you only produced one e-mail between Sotheby's and yourself? A. Yes. I was aware of that. Q. And is it your testimony that no you do not have any other documents that are responsive to that request? A. When it comes to the 16 A. When it comes to the 17 homesteading, I don't have no. It would 18 be the real estate agreement. Q. And so, just so I'm clear. If's your testimony that you 20 recognize that. I I told you how it 19 yielly works. The present of your testimony that you 20 recognize that. I I told you how it 19 yielly works. Converge of the Palm Beach condo other 25 than this Sotheby's e-mail? Page 263 request Number 2? Page 264 even get why I would be asked about his stuff with the Palm Beach condo. I don't stuff with the Pa | | | - | - · · · |
| 9 response to Document Request 1, you only 10 produced one e-mail between Sotheby's and 11 yoursel? 12 A. Yes. I was aware of that. 13 Q. And is it your testimony that 14 noyou do not have any other documents 15 that are responsive to that request? 16 A. When it comes to the 17 homesteading, I don't have no. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 19 Q. And so, just so I'm clear. 19 Q. And so, just so I'm clear. 20 It's your testimony that you 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? 26 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his I I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier - there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics'" such as credit card 22 statements, receipts, reimbursements, 23 tinieraries, airline or train tickets, car 24 rental reservations, lodging bookings or 18 myour testimfon that you 19 don't have a single document request winterplants of the request? 20 CoNFIDENTIAL ~ DR. MA | | | l | |
| 10 produced one e-mail between Sotheby's and 11 yoursel? | | | | |
| 11 yourself? 12 A. Yes. I was aware of that. 13 Q. And is it your testimony that 14 no you do not have any other documents 15 that are responsive to that request? 16 A. When it comes to the 17 homesteading, I don't have no. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 19 Q. And so, just so I'm clear. 20 It's your testimony that you 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? 26 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything a personal about his11 totally don't 4 even get why I would be asked about his stuff with the Palm Beach condo. 4 even get why I would be asked about his stuff with the Palm Beach condo. 5 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go to to and let's zoom in, Joanna, and so we can go document request by 12 document request just so it's a 13 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 10 logistics' such as credit card 21 logistics' such as credit card 22 renatl reservations, lodging bookings or 24 11 the mayor and his staff to attend the RNC 12 and DNC as part of his role with 18 had DNC as part of his role with 18 had DNC as part of his role with 18 had DNC as part of his role with 19 had DNC as part of his role with 18 had DNC and DNC as part of his role with 18 had DNC and DNC as part of his role with 19 had DNC and DNC as part of his role with 19 had Dov understand that you didn't produce any documents in response to that request? 18 A. Un-hmm. 19 A. Und-hmm. 20 A. Had boy ou understand that you didn't produce any documents in response to that request? 22 To that request? 23 It the mayor and his staff to A. Un-hman. 24 (D. A. Und-hmm. 25 A. Und-hmm. 26 A. Ves. I - I absolutely ecogni | | | l | • |
| A. Yes. I was aware of that Q. And is if your testimony that 10 | | • | l | |
| 13 FrankSpeech TV?" 14 no you do not have any other documents 15 that are responsive to that request? 16 A. When it comes to the 16 17 homesteading, I don't have no. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 10 I's your testimony that you 20 coroganize that. I I told you how it 21 typically works. 22 Cocupancy of the Palm Beach condo other 23 itine assier to see. 10 CONFIDENTIAL ~ DR. MARIA RYAN 2 | | · · | | |
| 14 | | | l | |
| 15 that are responsive to that request? 16 A. When it comes to the 17 homesteading, I don't have no. It would 18 be the real estate agreement. 19 Q. And so, just so I'm clear. 19 It's your testimony that you 20 don't have any texts or e-mails, phone 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? Page 263 1 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his 1 I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 rental reservations, lodging bookings or 24 Chiban travel or train tickets, car 25 Is the travel or you understand that you 26 didn't have a labsoluce any documents in response to that request? 26 that request? 27 A. Ves. I I absolutely 28 A. Yes. I I absolutely 29 recognize that. I I told you how it typically works. 29 Q. Okay. And just so I'm clear. 30 And your testimony that you 30 don't have a single document responsive to 31 Request Number 2? 32 CONFIDENTIAL ~ DR. MARIA RYAN 32 A. I don't believe I do. 34 A. I don't believe I do. 35 MR. CAMMARATA: Objection. 40 Okay. Going to Document 50 Sequest Number 3: 51 CONFIDENTIAL ~ DR. MARIA RYAN 51 A. Jeh Palm Palm Beach 61 "All physical or electronic 62 calenders or schedules reflecting 63 CONFIDENTIAL ~ DR. MARIA RYAN 64 A. I don't believe I do | | | | - |
| 16 | | | | · · · · · · · · · · · · · · · · · · · |
| 17 homesteading, I don't have no. It would lab be the real estate agreement. 18 that request? 19 A. Yes. I I absolutely records or anything, moving documents, 21 typically works. 22 Q. Okay. And just so I'm clear. 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? Page 263 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his I I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. 5 have anything on his Palm Palm Beach condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 2 document request just so it's a 13 little easier to see. 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for documents and communications relating to ravel plans and 10 logistics" such as credit card 22 rental reservations, lodging bookings or 24 Mr. Giuliani's m. passport, 25 Mr. Giuliani's m. passport, 18 that request? 18 that request? 19 A. Yes. I I absolutely recognize that. I I told you how it typically works. 20 Okay. And just so I'm clear. 21 typically works. 20 Okay. And just so I'm clear. 21 Is it your testimony that you 21 typically works. 22 O. Okay. And just so I'm clear. 23 Is it your testimony that you 24 don't have a single document responsive to Request Number 2? 25 CONFIDENTIAL ~ DR. MARIA RYAN 21 A. I don't believe I do. 3 MR. CAMMARATA: Objection. 4 Q. Okay. Going to Document 5 Request Number 2? 22 There are no responsive 23 There are no responsive 24 There are no responsive 25 There are no responsive 26 There are no responsive 27 There are no responsive | | • • | l | |
| 18 be the real estate agreement. 19 | | | l | · · · · · · · · · · · · · · · · · · · |
| 19 Q. And so, just so I'm clear. 20 It's your testimony that you 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 22 23 Invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? 25 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 26 A. Yes. I I absolutely recognize that. I I told you how it typically works. 22 Q. Okay. And just so I'm clear. 23 Is it your testimony that you don't have a single document responsive to Request Number 2? 15 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 2 A. Yes. I I absolutely recognize that. I I told you how it typically works. 20 Okay. And just so I'm clear. 3 Is it your testimony that you don't have a single document responsive to Request Number 2? 16 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. I don't believe I do. MR. CAMMARATA: Objection. 4 Q. Okay. Going to Document 4 Q. Okay. Going to Document 5 Request Number 3: Requ | | • | | |
| 20 It's your testimony that you 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? 24 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his1 I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 2 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for documents and communications relating to 17 documents and communications relating to 22 statements, receipts, reimbursements, 23 Is it your testimony that you don't have a single document responsive to 25 Request Number 2? Page 263 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. I don't believe I do. 3 MR. CAMMARATA: Objection. 4 Q. Okay. Going to Document 8 Request Number 3: 6 "All physical or electronic calenders or schedules reflecting 9 Defendant's travel or whereabouts 11 "There are no responsive documents to this request." 11 "There are no responsive documents to this request." 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is for: 18 for: 19 "Documents or communication sufficient to show the location of 19 Defendant's Sensitive Personal 20 Extenents, receipts, reimbursements, 22 defined as: 24 rental reservations, lodging bookings or 24 Mr. Giuliani's" passport, | | | l | <u> •</u> |
| 21 don't have any texts or e-mails, phone 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? Page 263 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his ~-1 I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. Request Number 3: 6 mR. CAMMARATA: Objection. 7 calenders or schedules reflecting 9 mS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itine or train tickets, car 24 rental reservations, lodging bookings or Page 263 1 typically works. 2 Q. Okay. And just so I'm clear. 3 Is ty your testimony that you 4 don't have a single document responsive to 22 Request Number 2? CONFIDENTIAL ~ DR. MARIA RYAN 4. I don't believe I do. 3 MR. CAMMARATA: Objection. 4 Q. Okay. Going to Document 5 request Number 2? Page 265 CONFIDENTIAL ~ DR. MARIA RYAN 4. I don't believe I do. 4 Q. Okay. Going to Document 5 request Number 2? Page 265 CONFIDENTIAL ~ DR. MARIA RYAN 4. I don't believe I do. 4 Q. Okay. Going to Document 5 request Number 2? Page 265 CONFIDENTIAL ~ DR. MARIA RYAN 6. I don't have a single document request but anything on his Palm - Palm Beach 6 "All physical or electronic 6 "All physical or electronic 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 9 throughout 2024." 10 And your response is: 11 "There are no responsive document request in the part of the part | | - | l | · · · · · · · · · · · · · · · · · · · |
| 22 records or anything, moving documents, 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? 26 | | * * | | · |
| 23 invoices relating to Mr. Giuliani's use and 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? Page 263 1 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his I I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 16 documents and communications relating to 17 documents and communications relating to 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 23 Is it your testimony that you don't have a single document responsive to 224 don't have a single document responsive to Request Number 2? Page 265 Request Number 2? Page 265 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. I don't believe I do. 3 MR. CAMMARATA: Objection. 4 Q. Okay. Going to Document Request 2 is 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 9 throughout 2024." 10 And your response is: 11 "There are no responsive 12 documents to this request." 11 and so we can go document request by 11 "There are no responsive 12 documents of this request." 12 document request 2 is for 12 documents of the wall calendar. 13 A. Yes. You are aware 14 Q. Is that correct? 14 Q. Is that correct? 15 A he has you are aware of that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is for: 18 per 19 per | | | l | ** * |
| 24 occupancy of the Palm Beach condo other 25 than this Sotheby's e-mail? Page 263 CONFIDENTIAL ~ DR. MARIA RYAN 2 A. No. I wouldn't have anything 3 personal about his ~ I ~ I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm ~ Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to ~ and let's ~ zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier ~ there you go, it's a 14 little easier — there you go, it's a 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itine aries, airline or train tickets, car 24 rental reservations, lodging bookings or Page 263 Request Number 2? Page 263 CONFIDENTIAL ~ DR. MARIA RYAN 4. I don't believe I do. Request Number 2? CONFIDENTIAL ~ DR. MARIA RYAN 4. I don't believe I do. Request Number 2? CONFIDENTIAL ~ DR. MARIA RYAN 4. I don't believe I do. Request Number 3: MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic realenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." 10 And your response is: 11 "There are no responsive documents to this request." 12 documents to this request." 13 A. Yes. You are aware — 14 Q. Is that correct? 15 A. — he has — you are aware of that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is for: 18 procuments or communication 19 sufficient to show the location of 10 pefendant's Sensitive Personal 21 perental reservations, lodging bookings or 24 mental reservations, lodging bookings or 25 doruments a repust Number 3: 26 doruments a repust Number 3: 27 doruments a repust A. I and on't he are the plane and conduction of polyments a | | | l | |
| 25 than this Sotheby's e-mail? | | | 23 | |
| Page 263 CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Request Number 3: Befendant's travel or whereabouts MS. HOUGHTON-LARSEN: Let's go MS. HOUGHTON-LARSEN: Let's go MS. HOUGHTON-LARSEN: Let's go Locard and so we can go document request by Locard document request just so it's a Little easier there you go, it's a Little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, Defendant's travel or whereabouts throughout 2024." A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Fequest Number 3: All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: There are no responsive documents to this request." A. Yes. You are aware Little easier to see. A. Haban A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. MR. CAMMARATA: Objection. A. I don't believe I do. A. I don't be in the selection of befendant's travel or whereabouts A. I don't believe I do. A. I don't believe I do. A. I don't believe I do | | ž • | l | |
| CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go MS. HOUGHTON-LARSEN: Let's go MS. HOUGHTON-LARSEN: Let's go In to and let's zoom in, Joanna, In and so we can go document request by In document request just so it's a Ilittle easier there you go, it's a Ilittle easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for In documents and communications relating to Mr. Giuliam's travel between July 1 st, Defendant's travel or whereabouts In the request which is request." In the request which is request. In the casier there you go, it's a In the easier to see. In the casier the pound of the wall calendar. In the casier to see. In the casier the pound of the wall calendar. In the casier to see. In the casier the pound of the wall calendar. In the casier to see. In the casier the pound of the wall calendar. In the casier the pound of the wall calendar. In the casier the pound of the wall calendar. In the casier the pound of the wall calendar. In the casier the pound of the wall calendar. In the casier the pound of the wall calendar. In the casier the pound of the wall calendar. In the casier the pound of the point of the pound | 25 | than this Sotheby's e-mail? | 25 | Request Number 2? |
| 2 A. No. I wouldn't have anything 3 personal about his I I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics'' such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 2 A. I don't believe I do. 3 MR. CAMMARATA: Objection. 4 Q. Okay. Going to Document 5 Request Number 3: 6 "All physical or electronic 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 9 throughout 2024." 10 And your response is: 11 "There are no responsive documents to this request." 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 25 A. I don't believe I do. 4 Q. Okay. 9 MR. CAMMARATA: Objection. 4 Q. Okay. 5 A he has you are aware 14 Little easier or there you go, it's a 13 A. Yes. You are aware 14 Q. Okay. 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. 18 Original Planting or travel plans and 29 Sufficient to show the location of 20 Sufficient to show the location of 20 Sufficient to show the location of 2 | | Page 263 | | Daga 265 |
| 3 personal about his I I totally don't 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics'' such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 1 MR. CAMMARATA: Objection. 4 Q. Okay. Going to Document 5 Request Number 3: 6 "All physical or electronic 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 10 And your response is: 11 "There are no responsive documents to this request." 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 rental reservations, lodging bookings or 24 MR. Giuliani's " passport, | | = | | |
| 4 even get why I would be asked about his 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 4 Q. Okay. Going to Document 5 Request Number 3: 6 "All physical or electronic 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 9 throughout 2024." 10 And your response is: 11 "There are no responsive 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 1 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 5 stuff with the Palm Beach condo. I don't 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 15 Request Number 3: 6 "All physical or electronic 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 9 throughout 2024." 10 And your response is: 11 "There are no responsive 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything | | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. |
| 6 have anything on his Palm Palm Beach 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 6 "All physical or electronic 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 9 throughout 2024." 10 And your response is: 11 "There are no responsive 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't | 2 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. |
| 7 condo. 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 7 calenders or schedules reflecting 8 Defendant's travel or whereabouts 10 And your response is: 11 "There are no responsive 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 rental reservations, lodging bookings or 25 defined as: 26 And your response is: 10 And your response is: 11 "There are no responsive 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his | 2 3 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document |
| 8 Q. Okay. 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 10 And your response is: 10 And your response is: 11 "There are no responsive 12 documents to this request." 11 documents to this request." 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 24 Mr. Giuliani's" passport, | 2 3 4 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't | 2 3 4 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: |
| 9 MS. HOUGHTON-LARSEN: Let's go 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 10 And your response is: 10 And your response is: 11 "There are no responsive 12 documents to this request." 11 A. Yes. You are aware 12 documents to this request." 13 A. Yes. You are aware of 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 rental reservations, lodging bookings or 24 Mr. Giuliani's" passport, | 2 3 4 5 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't | 2 3 4 5 6 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic |
| 10 to and let's zoom in, Joanna, 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 10 And your response is: 11 "There are no responsive 12 documents ot this request." 12 documents ot this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 rental reservations, lodging bookings or 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. | 2 3 4 5 6 7 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting |
| 11 and so we can go document request by 12 document request just so it's a 13 little easier there you go, it's a 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 11 "There are no responsive 12 documents to this request." 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. | 2 3 4 5 6 7 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts |
| document request just so it's a little easier there you go, it's a little easier to see. 14 | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." |
| little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 2023 and August 8th, 2024. It seeks all conversations relating to travel plans and logistics" such as credit card statements, receipts, reimbursements, itineraries, airline or train tickets, car rental reservations, lodging bookings or 13 A. Yes. You are aware 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 rental reservations, lodging bookings or 26 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: |
| 14 little easier to see. 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 14 Q. Is that correct? 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by | 2 3 4 5 6 7 8 9 10 11 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive |
| 15 Q. So reading from Plaintiffs' 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 15 A he has you are aware of 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a | 2 3 4 5 6 7 8 9 10 11 12 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." |
| 16 Exhibit 25, Document Request 2 is for 17 documents and communications relating to 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 16 that. You're aware of the wall calendar. 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a | 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware |
| 17 Q. Okay. Document Request 4 is 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 17 Q. Okay. Document Request 4 is 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. | 2 3 4 5 6 7 8 9 10 11 12 13 14 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? |
| 18 Mr. Giuliani's travel between July 1st, 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 18 for: 19 "Documents or communication 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of |
| 19 2023 and August 8th, 2024. It seeks all 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 26 "Documents or communication 27 Sufficient to show the location of 28 Property", which I will tell you is 29 defined as: 20 defined as: 21 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. |
| 20 conversations relating to travel plans and 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 20 sufficient to show the location of 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is |
| 21 logistics" such as credit card 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 21 Defendant's Sensitive Personal 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is for: |
| 22 statements, receipts, reimbursements, 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 22 Property", which I will tell you is 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 2023 and August 8th, 2024. It seeks all | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is for: "Documents or communication |
| 23 itineraries, airline or train tickets, car 24 rental reservations, lodging bookings or 23 defined as: 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 2023 and August 8th, 2024. It seeks all conversations relating to travel plans and | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is for: "Documents or communication sufficient to show the location of |
| 24 rental reservations, lodging bookings or 24 Mr. Giuliani's" passport, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 2023 and August 8th, 2024. It seeks all conversations relating to travel plans and logistics" such as credit card | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is for: "Documents or communication sufficient to show the location of Defendant's Sensitive Personal |
| | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 2023 and August 8th, 2024. It seeks all conversations relating to travel plans and logistics" such as credit card statements, receipts, reimbursements, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is for: "Documents or communication sufficient to show the location of Defendant's Sensitive Personal Property", which I will tell you is |
| 25 lodging folios." 25 birth certificate, will, trust documents, | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 2023 and August 8th, 2024. It seeks all conversations relating to travel plans and logistics" such as credit card statements, receipts, reimbursements, itineraries, airline or train tickets, car | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is for: "Documents or communication sufficient to show the location of Defendant's Sensitive Personal Property", which I will tell you is defined as: |
| | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 | CONFIDENTIAL ~ DR. MARIA RYAN A. No. I wouldn't have anything personal about his I I totally don't even get why I would be asked about his stuff with the Palm Beach condo. I don't have anything on his Palm Palm Beach condo. Q. Okay. MS. HOUGHTON-LARSEN: Let's go to and let's zoom in, Joanna, and so we can go document request by document request just so it's a little easier there you go, it's a little easier to see. Q. So reading from Plaintiffs' Exhibit 25, Document Request 2 is for documents and communications relating to Mr. Giuliani's travel between July 1st, 2023 and August 8th, 2024. It seeks all conversations relating to travel plans and logistics" such as credit card statements, receipts, reimbursements, itineraries, airline or train tickets, car rental reservations, lodging bookings or | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 | CONFIDENTIAL ~ DR. MARIA RYAN A. I don't believe I do. MR. CAMMARATA: Objection. Q. Okay. Going to Document Request Number 3: "All physical or electronic calenders or schedules reflecting Defendant's travel or whereabouts throughout 2024." And your response is: "There are no responsive documents to this request." A. Yes. You are aware Q. Is that correct? A he has you are aware of that. You're aware of the wall calendar. Q. Okay. Document Request 4 is for: "Documents or communication sufficient to show the location of Defendant's Sensitive Personal Property", which I will tell you is defined as: Mr. Giuliani's" passport, |

67 (Pages 262 - 265)

| 1 | Page 266 CONFIDENTIAL ~ DR. MARIA RYAN | 1 | Page 268 |
|----------|---|----|---|
| 1 | | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| | divorce records, personal and family | 2 | A. Yes. I thought I had I saw |
| | heirlooms, and sports memorabilia." | 3 | it somewhere, but it could've been from his |
| 4 | And your response is: | 4 | attorney, an invoice from Corporate, but |
| 5 | "Skyline but I do not know the | 5 | when I went to look in the e-mail, I |
| | address." | 6 | couldn't find any. |
| 7 | Do you see that? | 7 | Q. Okay. So when it says: |
| 8 | A. Yep. | 8 | "Put in invoice from |
| 9 | Q. And then you say: | 9 | corporate" in parenthesis, did you write |
| 10 | "Corporate Transfer in | 10 | that as a note |
| 1 | Ronkonkoma." | 11 | A. I did. |
| 12 | Do you see that? | 12 | Q to yourself? |
| 13 | A. Yes. | 13 | A. That was a note to myself. |
| 14 | Q. Is it your testimony that | 14 | Q. All right. |
| 15 | Mr. Giuliani keeps his sensitive personal | 15 | A. Because I thought |
| 16 | property, such as his passport, birth | 16 | Q. Okay. |
| 17 | certificate, will, trust documents, divorce | 17 | A I had it, but then I |
| 18 | records, personal and family heirlooms and | 18 | remembered I was shown on a screen the |
| 19 | sports memorabilia, at storage facilities? | 19 | invoice, so I actually never had it in my |
| 20 | MR. CAMMARATA: Objection. | 20 | possession. |
| 21 | A. I have no idea. I think I | 21 | Q. So, okay, let's go to Document |
| 22 | misunderstood that question. I I would | 22 | Request 8: |
| | have to I should have said, "I don't | 23 | "All documents and |
| | know". | 24 | communications relating to Standard USA, |
| 25 | Q. Okay. | 25 | LLC in any way, including but not limited |
| | Page 267 | | Page 269 |
| 1 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | A. I thought I was asking about | 2 | to its formation, corporate structure, |
| | what storage facilities he had, so I | 3 | owners, members, financial records, bank |
| | apologize for that. | 4 | account, assets, debts, loans, payments, |
| 5 | But I don't know where he keeps | 5 | profits, property, financial transactions, |
| | his personal documents. | 6 | and total, yearly and monthly revenue." |
| 7 | Q. I understand. | 7 | And in response to Document |
| 8 | Let's go to Document Request 7, | 8 | Request Number 8, you write: |
| | and that says: | 9 | "Standard USA, LLC had to form |
| 10 | "All documents and | 10 | because you illegally seized the money for |
| 1 | communications relating to the storage of | 11 | Giuliani Communications and employees did |
| | property at Corporate Transfer Storage | 12 | not get paid for two months." |
| | Inc., America First Warehouse and Sky Line | 13 | Do you see that? |
| 14 | Warehouseincluding but not limited to | 14 | A. Yes. It was very shameful. |
| | = | 15 | |
| | contracts, invoices, payments, access to or | | Q. And do you understand that you didn't produce a single document in |
| | the transference of any of the properties | 16 | 1 0 |
| 1 | stored at either location." | 17 | response to Document Request Number 8? |
| 18 | And your answer has, in | 18 | MR. CAMMARATA: Objection. |
| 1 | parenthesis: | 19 | A. Well, I I was told that you |
| 20 | "Put in invoice from | 20 | already had the Standard USA corporate |
| | corporate" | 21 | structure. |
| 22 | And then, outside of | 22 | Q. Who told you that? |
| | parenthesis: | 23 | MR. CAMMARATA: Objection. |
| | "I cannot find the invoice." | 24 | A. An attorney. |
| 24 25 | Do you see that? | 25 | Q. Not your attorney? |

68 (Pages 266 - 269)

| 1 | Page 270 | 1 | Page 272 |
|--|--|--|---|
| 1 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | A. No. I just hired Adam when I | 2 | MR. CAMMARATA: Objection. |
| 3 | found out I had to be deposed. | 3 | A. I know what I would get for |
| 4 | Q. Okay. So was it one of | 4 | direct deposit, yes. |
| 5 | Mr. Giuliani's attorneys who told you? | 5 | Q. You have access to your own |
| 6 | A. I believe so. | 6 | bank accounts online? |
| 7 | MR. CAMMARATA: Don't guess. | 7 | A. I do. |
| 8 | A. I don't know then. | 8 | Q. And those bank account |
| 9 | Q. And you testified earlier in | 9 | statements reflect money that you were paid |
| 10 | today's deposition that you have access via | 10 | by Giuliani Communications? |
| 11 | an online portal to the iTHINK bank account | 11 | A. Yes. |
| 12 | held by Standard USA; correct? | 12 | Q. And you didn't produce any of |
| 13 | A. Yes. | 13 | those documents in response to this |
| 14 | Q. And in response to this | 14 | request? |
| 15 | document subpoena, you didn't produce any | 15 | A. I didn't. Same same answer. |
| 16 | of those online banking records, did you? A. I did not. And I did not have | 16 | I felt like what I earn is my |
| 17 | | 17 | business. I'm not under indictment for |
| 18 | an attorney at that time. And I would have | 18 | anything. And I find that quite abusive. |
| 19 | to discuss that with Adam, because I'm | 19 | So now that I have an attorney, |
| 20 | having a hard time wrapping around my head | 20 | I will discuss that with my attorney. |
| 21 | what business is it of yours. | 21 | Q. Document Request 14 asks: |
| 22 | And I don't want anybody else | 22 | "All documents and |
| 23 | hurt by the antics of Willkie Farr & | 23 | communications relating to the transfer of |
| 24 | Gallagher. | 24 | any money or property from you to" |
| 25 | So somebody's private bank | 25 | Mr. Giuliani or Mr. Giuliani "to you." |
| | Daga 271 | | |
| 1 | Page 271 | 1 | Page 273 |
| 1 2 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 2 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's | 2 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of |
| 2 3 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I | 2 3 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, |
| 2 3 4 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have | 2 3 4 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. |
| 2 3 4 5 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. | 2 3 4 5 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you |
| 2 3 4 5 6 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: | 2 3 4 5 6 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: |
| 2 3 4 5 6 7 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and | 2 3 4 5 6 7 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab |
| 2 3 4 5 6 7 8 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to | 2 3 4 5 6 7 8 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I |
| 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times |
| 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate | 2 3 4 5 6 7 8 9 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the |
| 2 3 4 5 6 7 8 9 10 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial | 2 3 4 5 6 7 8 9 10 11 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." |
| 2 3 4 5 6 7 8 9 10 11 12 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, | 2 3 4 5 6 7 8 9 10 11 12 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. |
| 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, | 2 3 4 5 6 7 8 9 10 11 12 13 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly | 2 3 4 5 6 7 8 9 10 11 12 13 14 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any Q have in your response | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that information pardon me. I don't mean to |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any Q have in your response A. I don't have any documents. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that information pardon me. I don't mean to cut you off. I'm sorry, Dr. Ryan. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any Q have in your response A. I don't have any documents. Q. Pardon? | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that information pardon me. I don't mean to cut you off. I'm sorry, Dr. Ryan. A. No. |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any Q have in your response A. I don't have any documents. Q. Pardon? A. I don't have any documents | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that information pardon me. I don't mean to cut you off. I'm sorry, Dr. Ryan. A. No. I don't save anything. It's |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any Q have in your response A. I don't have any documents. Q. Pardon? A. I don't have any documents relating to that. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that information pardon me. I don't mean to cut you off. I'm sorry, Dr. Ryan. A. No. I don't save anything. It's pretty fluid. Yeah. So everybody helps |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any Q have in your response A. I don't have any documents. Q. Pardon? A. I don't have any documents relating to that. Q. Do you have any documents | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that information pardon me. I don't mean to cut you off. I'm sorry, Dr. Ryan. A. No. I don't save anything. It's pretty fluid. Yeah. So everybody helps each other out. Sometimes Ted picks up a |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | CONFIDENTIAL ~ DR. MARIA RYAN information, I I don't get why that's got to do with his homesteading. And so I would have to seek counsel. I did not have counsel when I filled these out. Q. And Document Request 9 asks: "All documents and communications relating to Giuliani Communications LLC in any way, including but not limited to its corporate structure, owners, members, financial records, bank accounts, assets, debts, loans, payments, profits, property, financial transactions, and total, yearly and monthly revenue." Do you A. I don't any Q have in your response A. I don't have any documents. Q. Pardon? A. I don't have any documents relating to that. | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 | CONFIDENTIAL ~ DR. MARIA RYAN This includes gifts, payment of expenses, travel, day-to-day expenses, meals, lodging, dry cleaning, or clothing. And in response to this, you write: "Have you ever picked up a tab at a restaurant? In the past, sometimes I would do it for the staff and other times the mayor would do it. I do not know the dates nor do I have receipts." A. That's right. Q. Is that correct? A. That's very honest, yeah. Q. Okay. A. Yeah Q. You think that that information pardon me. I don't mean to cut you off. I'm sorry, Dr. Ryan. A. No. I don't save anything. It's pretty fluid. Yeah. So everybody helps |

69 (Pages 270 - 273)

| | Page 274 | | Page 276 |
|-----|---|----|---|
| 1 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | these everyday things. I I am I'd | 2 | A. Yes. |
| 3 | would be surprised if you kept the receipts | 3 | Q. Did you produce that document |
| l . | for that. | 4 | to Plaintiffs? |
| 4 | | 5 | A. I did not. |
| 5 | Q. Do you recall earlier today we | | |
| 6 | looked at a document, an e-mail between you | 6 | Q. Do you recall earlier today we |
| 7 | and Joe Ricci | 7 | looked at a document about a contract with |
| 8 | A. Yes. | 8 | a man named Igor for \$100,000.00? |
| 9 | Q in which you were referring | 9 | MR. CAMMARATA: Objection. |
| 10 | to a payment | 10 | A. That was in 2021. That was not |
| 11 | A. Yep. | 11 | asked of me. |
| 12 | Q that you made | 12 | Q. Okay. Thank you. |
| 13 | A. Yep. | 13 | MS. HOUGHTON-LARSEN: So just |
| 14 | Q for Mr. Giuliani's | 14 | to close the loop on this, let's look |
| 15 | medication? | 15 | at document Tab 32, Joanna. |
| 16 | A. Yep. | 16 | And this is Plaintiffs' |
| 17 | Q. Did you produce that document | 17 | Exhibit 26. |
| 18 | to Plaintiffs? | 18 | (Whereupon, Plaintiffs' |
| 19 | A. No. | 19 | Exhibit 26, E-mail Chain, was marked |
| 20 | I don't have it. | 20 | for identification as of this date by |
| 21 | Q. Document Request 15 asks for: | 21 | the Reporter.) |
| 22 | "Document or communications | 22 | Q. Dr. Ryan, do you recognize this |
| 23 | relating to agreements or contracts that | 23 | document? It's the single document you |
| 24 | relate in any way to assets or property" | 24 | produced to Plaintiffs in response to |
| 25 | possessed by Mr. Giuliani with | 25 | Plaintiffs' document request? |
| | Page 275 | | Page 277 |
| 1 | CONFIDENTIAL ~ DR. MARIA RYAN | 1 | CONFIDENTIAL ~ DR. MARIA RYAN |
| 2 | "agreements and contracts with Corporate | 2 | A. What's that? What was the |
| 3 | Transfer Storagefor the moving and | 3 | question? |
| 4 | storage of" Mr. Giuliani's "physical | 4 | Q. Do you recognize this document |
| 5 | property." | 5 | as the single document that was in response |
| 6 | And your response is: | 6 | to Plaintiffs that you produced in |
| 7 | "See attached invoice. I | 7 | response to Plaintiffs' document request? |
| 8 | cannot find the invoice." | 8 | A. I recognize it yes. |
| 9 | A. Same thing. I thought I may | 9 | Q. When you received the document |
| 10 | have the invoice, but when it came down to | 10 | request or became aware of it, did you take |
| 11 | it, I was just shown the invoice over a | 11 | steps to search your files? |
| 12 | screen, and I had never had it in my | 12 | A. I did. I did. I put in the |
| 13 | physical possession. And there was never | 13 | search thing on the top, and that's how I |
| 14 | a | 14 | was surprised I had anything from Sotheby's |
| 15 | Q. Do you recall a | 15 | anymore, actually. |
| 16 | MR. CAMMARATA: Objection. | 16 | But, yes, I did. |
| 17 | Q. Do you recall earlier | 17 | Q. Do you recall what search terms |
| 18 | MS. HOUGHTON-LARSEN: | 18 | you used? |
| 19 | Mr. Cammarata, what are you objecting | 19 | A. I did Corporate depending on |
| 20 | to? I didn't ask the question. | 20 | the question, I remember doing "Skyline," |
| 21 | MR. CAMMARATA: Yeah. I | 21 | "Corporate Transfer," and other things like |
| 22 | withdraw it. | 22 | that, depending on the question. |
| 23 | Q. Dr. Ryan, do you recall earlier | 23 | Q. Okay. And did you produce to |
| 24 | | 24 | |
| 25 | today you were talking about a contract with Burke Brands coffee? | | Plaintiffs every document that showed up |
| | with Durke Dialius confect | 25 | when you did those searches? |

70 (Pages 274 - 277)

| | | D 214 | | D 216 |
|----------|--|----------|----------|---|
| 1 | | Page 314 | 1 | Page 316 |
| 2 | EXHIBITS (cont'd) Exh 17 Giuliani Apartment Library 213 | | 2 | INDEX |
| | Photo Photo | | | WITNESS: MARIA RYAN |
| 4 | Exh 18 Giuliani Apartment Kitchen 217 | | 4 | TV. A DV. TVOV DV. |
| 5 | Photo | | 5 | EXAMINATION BY PAGE |
| | Exh 19 8/8/2024 E-mail 219 Exh 20 Calendar 226 | |) | MS. HOUGHTON-LARSEN 8 |
| | Exh 21 Redacted Handwritten 229 | | 6 | MS. HOUGHTON EMBEN |
| 9 | Calendar Reminders | | 7 | |
| | Exh 22 Response to Information 233 | | 8 | INFORMATION AND/OR DOCUMENTS REQUESTED |
| 10 11 | Subpoena Exh 23 Information Subpoena 249 | | 9 | None |
| 12 | with Restraining Notice | | 10 | OUESTIONS MADIZED FOR BUILINGS |
| 12 | pursuant to CPLR Sections 5222 and 5224 | | 11 | QUESTIONS MARKED FOR RULINGS |
| 13 | Enh 24 Occations in Compation 252 | | 11 | None |
| 14 | Exh 24 Questions in Connection 253 With information Subpoena | | 12 | |
| 1.5 | to Standard USA LLC | | 13 | |
| 15 16 | Standard USA LLC Exh 25 Subpoena to Produce 255 | | 14 | |
| 17 | Documents, Information, or Objects | | 15 | |
| 1 / | or to Permit Inspection of | | 16 17 | |
| 18 | Premises in a Civil Action Exh 26 E-mail Chain 276 | | 18 | |
| 20 | Exh 27 Document Request Response 260 | | 19 | |
| 21 | Exh 28 Defendants' [sic] response 280 to Plaintiffs' First Set of | | 20 | |
| 22 | Interrogatories | | 21 | |
| 23 | Exh 29 Defendant's Amended Initial 288 Disclosures Pursuant to | | 22 | |
| 24 | Federal Rules of Civil | | 23 24 | |
| 25 | Procedure Rule 26(a)(1) | | 25 | |
| | | Page 315 | | Page 317 |
| 1 | | S | 1 | |
| 2 | EXHIBITS (cont'd) | 20.5 | 2 | CERTIFICATE |
| 3 | Exh 30 Certification that Response is Correct and Complete | 295 | 3 | |
| 4 | is correct and complete | | _ | STATE OF NEW YORK) |
| • | Exh 31 Defendant Rudolph W. | 296 | 4 | : SS.: COUNTY OF NEW YORK) |
| 5 | Giuliani's Pretrial | | 5 | COUNTY OF NEW YORK |
| , | Disclosures Pursuant to | | 6 | I, KARYN CHIUSANO, a Notary Public |
| 6 | Federal Rule of Civil | | 7 | for and within the State of New York, do |
| 7 | Procedure 26(a)(3) | | 8 | hereby certify: |
| 8 | | | 9 | That the witness whose examination is |
| 9 | | | 10 | hereinbefore set forth was duly sworn and |
| 10 | | | 11 | that such examination is a true record of |
| 11 | (Exhibits ratained by Exhibit Chann) | | 12 | the testimony given by that witness. |
| 12 | (Exhibits retained by Exhibit Share.) | | 13 14 | I further certify that I am not related to any of the parties to this |
| 13 | | | 15 | action by blood or by marriage and that I |
| 14 | | | 16 | am in no way interested in the outcome of |
| 15 | | | 17 | this matter. |
| 16 | | | 18 | IN WITNESS WHEREOF, I have hereunto |
| 17 18 | | | 19 | set my hand this 1st day of January, 2025. |
| 19 | | | 20 | |
| 20 | | | 21 | / (a) . |
| 21 | | | 22 | Laryn Chisano |
| 22 23 | | | 23 | \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ |
| 1.14 | | | | KAKINCHIUSANU |
| | | | 24 | |
| 24 25 | | | 24 25 | |